

1 Honorable Benjamin H. Settle
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UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT TACOMA

10 RUSSELL D. GARRETT, Chapter 7
11 Trustee for the bankruptcy estate of Robert
and Stephanie Taylor,

12 Plaintiff(s),
13 v.
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MORGAN HENNING a/k/a MORGAN
ROTHSCHILD and HAYLEY HENNING
and FRANNET GLOBAL, LLC,

16 Defendant(s).
17

NO. 3:18-cv-05863-BHS

DECLARATION OF HAYLEY
HENNING IN SUPPORT OF MOTION
TO DISMISS OR IN THE
ALTERNATIVE, MOTION TO COMPEL
ARBITRATION AND STAY ACTION

Note on Motion Calendar
September 20, 2019

WITHOUT ORAL ARGUMENT

19 I, Hayley Henning, declares as follows:

20 1. I am over the age of 18 and am competent to testify to the following, which is based
on my personal knowledge.

22 2. I am the creative founder of the Party Princess concept, but between 2015 and 2018,
I was not involved with the Party Princess companies in any formal capacity. During that time, I
would offer Morgan Henning a/k/a Morgan Rothschild creative advice from time to time, if he

25 DECLARATION OF HAYLEY HENNING IN SUPPORT
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ACTION - 1
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NO. 3:18-cv-05863-BHS

PREG O'DONNELL & GILLETT PLLC

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SEATTLE, WASHINGTON 98164-2026
TELEPHONE: (206) 287-1775 • FACSIMILE: (206) 287-9113

1 asked for it, and attend the Discovery Day event, but otherwise, I was not involved with the
2 companies. I filed for divorce from Morgan Rothschild in early 2016.

3 3. I have never been to Washington State and have never owned real property in
4 Washington State, or operated a business in Washington State.

5 4. All my encounters with Robert (Sean) and Stephanie Taylor were in California.

6 5. I first met Mr. and Mrs. Taylor at the Discovery Day event, which took place at a
7 hotel in California. After the presentation that day, Mrs. Taylor started telling me about her
8 daughter. The conversation eventually led to how I cared for my own children. I explained how
9 I supplemented breast-feeding with homemade baby formula. Mrs. Taylor was very interested in
10 the idea so we started discussing other lifestyle interests, such as Mrs. Taylor's views on raw milk,
11 co-sleeping, gardening, and other "hippie" healthy lifestyle interests.

12 6. Eventually the conversation led to the vaccination of children. I asked Mrs. Taylor
13 if she vaccinated her children, which she did not. I then divulged that I also did not vaccinate my
14 children.

15 7. The decision to vaccinate children is a controversial issue. At the time I met Mrs.
16 Taylor, California was considering a bill that would force parents to vaccinate children. Mrs.
17 Taylor informed me she wanted to move out of California because she did not want to be forced
18 to vaccinate. Mrs. Taylor also divulged that she did not have many friends that shared the same
19 viewpoint.

20 8. Realizing we shared many of the same viewpoints, we exchanged numbers and
21 discussed getting together to discuss the vaccination bill and how to navigate the bill if it passed.
22 I also agreed to introduce Mrs. Taylor to other like-minded mothers, which I did through Facebook.
23 My impression was that Mrs. Taylor was very interested in developing friendships with others who
24 shared her lifestyle viewpoints.

9. Besides Discovery Day, I recall meeting Mrs. Taylor in person one other time at Mrs. Taylor's house when she was packing to move. Mrs. Taylor told me she wanted me to come over so she could give me a Kombucha Scoby. I thought we had become friends so I was happy to come over. Mrs. Taylor told me I should bring my mom and kids to make it a playdate, which I did.

10. During my visit with Mrs. Taylor at her home, we discussed Mrs. Taylor's garden, the work she was doing to sell her house, food, and taking care of kids. Mrs. Taylor also gave me instructions on how to care for the Kombucha Scoby.

11. When I visited with Mrs. Taylor, whether it was in person, by phone, or through social media, our conversations were always personal. I do not recall Mrs. Taylor ever asking me questions about the Party Princess franchise.

12. I recall a brief encounter with Mr. Taylor at Discovery Day, but I only recall him mentioning they were moving.

13. After the Taylors moved to Washington, I did not have further contact with Mr. or Mrs. Taylor.

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct

DATED this 27th day of August, 2019, at Seal Beach, California.

By 
Hayley Henning

DECLARATION OF HAYLEY HENNING IN SUPPORT
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MOTION TO COMPEL ARBITRATION AND STAY
ACTION - 3

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2 **DECLARATION OF SERVICE**
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5 I hereby certify under the penalty of perjury under the laws of the State of Washington that
6 on the date below, I electronically served the foregoing with the Clerk of the Court using the
7 CM/ECF system, which will send notification of such filing to all counsel of record.:
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9

10 **Counsel for Plaintiffs Russell D. Garrett,**
11 **Ch. 7 Trustee for the estate of Robert and**
12 **Stephanie Taylor:**

13 Phillip J. Haberthur
14 Landerholm, P.S.
15 805 Broadway, Suite 1000
16 P.O. Box 1086
17 Vancouver, WA 98666

18 *philh@landerholm.com*

19 **Counsel for Defendant Morgan**
20 **Rothschild:**

21 Curt Roy Hineline
22 Carolyn Robbs Bilanko
23 Anthony Robert Sterling
24 Baker & Hostetler LLP
25 999 Third Ave., Ste. 3600
 Seattle, WA 98104

26 *chineline@bakerlaw.com*
27 *cbilanko@bakerlaw.com*
28 *asterling@bakerlaw.com*

29 **Appointed Trustee of the Ch. 7 BK Estate**
30 **of Russell and Stephanie Taylor:**

31 Russell D. Garrett
32 Jordan Ramis, PC
33 1499 SE Tech Center Place, Ste. 380
34 Vancouver, WA 98683

35 *russ.garrett@jordanramis.com*

36 DATED at Seattle, Washington, this 28th day of August, 2019.

37 s/ Andrea Anthony

38 _____
39 Andrea H. Anthony